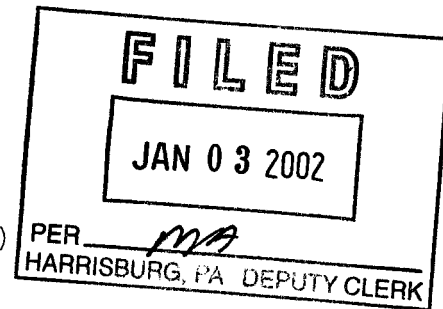


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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOAN D. TESCHÉ,
Plaintiff
v.
CNA INSURANCE COMPANIES, and
CONTINENTAL CASUALTY COMPANY,
Defendants : Civil Action No. 1:CV-01-0326
: (Judge Caldwell)



PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

1. Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Local Rule 56.1, and related provisions, plaintiff requests summary judgment in her favor and against defendants on Counts I and II of the amended complaint in that:

(a) there is no genuine issue as to any material fact; and

(b) plaintiff, as moving party, is entitled to judgment as a matter of law.

2. Plaintiff incorporates by reference herein all documents submitted in support of this motion and in opposition to any motion filed by either defendant.

WHEREFORE, plaintiff respectfully requests that this Honorable Court enter the accompanying order and grant such other relief as it deems appropriate.

Respectfully submitted,

KEEFER WOOD ALLEN & RAHAL, LLP

Dated: 1/3/02



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(Attorneys for Plaintiff)

CERTIFICATE OF NONCONCURRENCE

I, Bradford Dorrance, counsel for plaintiff, hereby certify that on January 2, 2002, I spoke with Michael J. Burns, counsel for defendants, concerning the relief requested in the foregoing motion, and Mr. Burns indicated that he does not concur in such motion.

Dated: 1/3/02


Bradford Dorrance

CERTIFICATE OF SERVICE


I hereby certify that I have this day served a copy of the foregoing document upon the person(s) and in the manner indicated below:

First-Class Mail, Postage Prepaid
Addressed as Follows:

Michael J. Burns, Esquire
CHRISTIE PARABUE MORTENSEN YOUNG
1880 JFK Boulevard
10th Floor
Philadelphia, PA 19103-7424

(Attorneys for Defendants)

Dated: 1/3/02


Bradford Dorrance